# IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS

SHOT BAR CHICAGO LLC, an Illinois	
Limited liability company,	
Plaintiff,	) Case No. 1:24-cv-08452
V.	)
	) Judge April M. Perry
SARAH HALVERSON, individually, and	
SARAH HALVERSON INC.,	) Magistrate Judge M. David Weisman
an Illinois corporation	)
1	)
Defendant.	)

## **MOTION TO STAY BRIEFING SCHEDULE**

Defendants Sarah Halverson and Sarah Halverson Inc. respectfully request an order staying the briefing schedule on (a) Defendants' Motion to Dismiss Counts I-III of the Amended Complaint, and (b) Plaintiff's Motion to Dismiss Defendants' Counterclaim. The grounds for this motion, to which Plaintiff agrees, are:

- 1. On October 10, 2024, Defendants moved to dismiss Counts I through III of the Amended Counterclaim. (D.E. 10).
- On November 22. 2024, Plaintiff filed a motion to dismiss the Counterclaim. (D.E.
   27).
  - 3. Briefing on both motions to dismiss remains open.
- 4. Based on the parties' representation that a settlement conference would be useful, this matter has been referred to Magistrate Judge Weisman for a settlement conference and discovery. (D.E. 22).

- 5. On November 20, 2024, the parties attend a settlement conference with Magistrate Judge Weisman and indicated that they believed discovery matters could be stayed so that the parties can focus their efforts on settlement.
- 6. The parties are now working with the Court to schedule a settlement conference in mid-January and the pending discovery motions have been entered and continued pending the settlement conference.
- 7. To allow the parties to focus their resources on settlement and preserve judicial resources, Defendants believe that briefing on the motions to dismiss should be stayed until the parties have a meaningful opportunity to resolve this matter through settlement.
- 8. As such, Defendants request a stay of the briefing on the motions and propose to submit a joint status report on February 1, 2025 to the Court reporting on the likelihood of informal resolution or with a proposed briefing schedule if settlement seems unlikely at that juncture.
- 9. Defendants reached out to Plaintiff's counsel regarding the relief sought herein and Plaintiff's counsel indicated that he had no objection to the relief sought herein. Plaintiff's counsel did indicate that the briefing schedule should be set out in this motion and in place before the settlement conference. However, because the settlement conference date has not yet been confirmed, Defendants believe it is the best approach to file a status report with a briefing schedule.
- 10. The relief sought herein will not prejudice any party and is not sought to delay the proceedings or for any other unjust reason.

### **Conclusion**

Wherefore, Defendants ask the Court to enter an order staying briefing on the parties' pending motions to dismiss pending the outcome of the settlement conference that both sides are working to schedule in mid January; requiring a joint status report be filed on or before February

1, 2025 with a status of settlement discussions or a briefing schedule on the motions; and for all other relief that the Court deems just and appropriate.

Dated: December 6, 2024

Respectfully submitted,

#### **SARAH HALVERSON**

/s/ Sabreena El-Amin
Defendant's Attorney

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### **CERTIFICATE OF SERVICE**

Under penalties as provided by law pursuant to 735 ILCS 5/1-109, the undersigned certifies that a true and correct copy of the foregoing **HALVERSON'S MOTION TO STAY BRIEFING SCHEDULE** were served via email to all counsel of record in this matter on December 6, 2024.

Signed and certified by: /s/ Scott Browdy

Scott Browdy Attorney at Law

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